



EDWARDS WILDMAN PALMER LLP
750 LEXINGTON AVENUE
NEW YORK, NY 10022
+1 212 308 4411 main +1 212 308 4844 fax
edwardswildman.com

Katherine D. Watson

Associate
+1 212 912 2937
fax +1 212 308 4844
kwatson@edwardswildman.com

January 30, 2014

VIA ECF

Hon. Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Felix-Williams v. Long Island College Hospital
Docket No. 13-cv-2772

Dear Judge Reyes:

On behalf of our client, Long Island College Hospital ("LICH"), I write pursuant to the Court's Motion and Individual Practices Rules Section II(D) to request a sixty day extension of the discovery deadline until April 7, 2014. Plaintiff consents to this request.

Pursuant to the Case Management Plan and Scheduling Order dated October 29, 2013, the parties are required to complete all fact and expert discovery, including depositions by February 7, 2014. We appeared for a status conference on November 21, 2013, at which time the Court explained the basic discovery process to Plaintiff. On December 30, 2013, Defendants served the following: (i) Notice of Deposition, (ii) First Set of Interrogatories, and (iii) First Request for the Production of Documents. On January 28, 2014, I received a telephone call from Plaintiff seeking a fifteen day extension of time to respond to our demands. We have no objection to this request other than the fact that it falls outside the original discovery deadline.

Given Plaintiff's *pro se* status and unfamiliarity with the litigation process, we request a sixty day extension to allow sufficient time to exchange discovery and take the necessary depositions. This is the first request for an extension. We have enclosed a revised Case Management Plan and Scheduling Order.

Respectfully submitted,

A handwritten signature in blue ink that reads "Katherine D. Watson".

Katherine D. Watson

Enclosure



Hon. Ramon E. Reyes, Jr.
January 30, 2014
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cc: Ms. Lisa Felix-Williams (via email and regular mail)
Pro Se Plaintiff
37 Centre Mall, #6B
Brooklyn, New York 11231

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LISA FELIX-WILLIAMS,

Plaintiff,

-against-

LONG ISLAND COLLEGE HOSPITAL,

Defendant.

13 Civ. 2772 (JBW) (RER)

**REVISED CASE MANAGEMENT
PLAN AND SCHEDULING ORDER**

Upon consent of the parties, it is HEREBY by ordered as follows:

1. All discovery, including depositions of experts, shall be completed on or before **April 7, 2014.**
2. Pre-motion letters regarding proposed dispositive motions must be submitted on or before **April 21, 2014.**
3. Final Pre-Trial Conference will be held on **April 14, 2014.**

The revised scheduling order may be altered or amended upon a showing of good cause not foreseeable at the date hereof.

Dated: Brooklyn, New York
_____, 2014

RAMON E. REYES, JR.
United States Magistrate Judge

CONSENTED TO:

/s/ Lisa Felix-Williams (see attached)
Lisa Felix-Williams
Pro Se Plaintiff
37 Centre mall, #6B
Brooklyn, New York 11231

EDWARDS WILDMAN PALMER LLP

By: Katherine D. Watson
Rory J. McEvoy, Esq.
Katherine D. Watson, Esq.
Attorneys for Defendant
750 Lexington Avenue
New York, New York
212.308.4411

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LISA FELIX-WILLIAMS,

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-against-

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13 Civ. 2772 (JBW) (RER)

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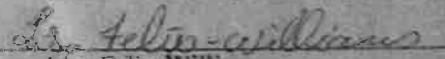
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_____, 2014

RAMON E. REYES, JR.
United States Magistrate Judge

CONSENTED TO:


Lisa Felix-Williams
Pro Se Plaintiff
37 Centre mall, #6B
Brooklyn, New York 11231

EDWARDS WILDMAN PALMER LLP

By: _____
Rory J. McEvoy, Esq.
Katherine D. Watson, Esq.
Attorneys for Defendant
750 Lexington Avenue
New York, New York
212.308.4411